

Adam E. Polk (SBN 273000)  
Simon S. Grille (SBN 294914)  
Trevor T. Tan (SBN 280145)  
Reid Gaa (SBN 330141)  
**GIRARD SHARP LLP**  
601 California Street, Suite 1400  
San Francisco, CA 94108  
Telephone: (415) 981-4800  
Facsimile: (415) 981-4846  
apolk@girardsharp.com  
sgrille@girardsharp.com  
ttan@girardsharp.com  
rgaa@girardsharp.com

*Counsel for Plaintiffs*

[Additional Counsel on Signature Page]

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

BRAYDEN STARK, JUDD OOSTYEN,  
ISAAC BELENKIY, VALERIE BURTON,  
LAURA GOODFIELD, and DENOVIA  
MACK, individually and on behalf of all others  
similarly situated,

Plaintiffs,

v.

PATREON, INC.,

Defendant.

Case No. 3:22-cv-03131-JCS

**STIPULATION AND [PROPOSED] ORDER  
TO SUSPEND CASE DEADLINES AND  
SCHEDULE A STATUS CONFERENCE**

**STIPULATION**

Pursuant to Civil Local Rule 6-2, Plaintiffs Brayden Stark, Judd Oostyen, Isaac Belenkiy, Valerie Burton, Laura Goodfield, and Denovias Mack (“Plaintiffs”) and Defendant Patreon, Inc. (“Patreon”) jointly stipulate as follows:

WHEREAS, the parties mediated before the Honorable Jeremy D. Fogel (Ret.) on June 27, 2023, November 20, 2023, March 5, 2024, and April 16, 2024;

WHEREAS, the parties have reached an agreement in principle on terms to resolve this action;

WHEREAS, the parties require additional time to prepare and execute a formal settlement agreement that embodies their agreement in principle;

WHEREAS, on April 14, 2023, the Court entered a scheduling order setting July 10, 2024, as the close of fact discovery (Dkt. No. 65);

WHEREAS, on February 12 and March 5, 2024, the Court entered orders setting: (1) an April 29, 2024 deadline for Plaintiffs to file their motion for class certification; (2) a June 12, 2024 deadline for Patreon to file its opposition; (3) a July 10, 2024 deadline for Plaintiffs to file their reply; (4) a hearing on Plaintiffs’ motion for class certification on August 16, 2024; and (5) additional deadlines governing the designation of experts and expert discovery (Dkt. Nos. 124, 138);

WHEREAS, in view of the impending case deadlines, the parties wish to conserve judicial and party resources and focus their efforts to finalizing the settlement of this action;

WHEREAS, the parties anticipate that within 60 days they will have executed a final settlement agreement and Plaintiffs will be prepared to file their motion for preliminary approval of the settlement.

NOW THEREFORE, subject to the Court’s approval, the parties hereby stipulate and agree to, and respectfully request that the Court enter an order suspending all case deadlines (*see* Dkt. Nos. 65, 124, and 138), setting a status conference for May 29, 2024, or as soon thereafter as is convenient for the Court, and establishing June 28, 2024 (or another appropriate date) as the deadline by which the parties will have executed a final settlement agreement and Plaintiffs will submit their motion for preliminary approval of the settlement. A proposed Order granting the foregoing relief appears beneath the signature blocks.

**IT IS SO STIPULATED.**

1 Dated: April 29, 2024

Respectfully submitted,

2 By: /s/ Simon S. Grille

3 Adam E. Polk (SBN 273000)

4 Simon S. Grille (SBN 294914)

5 Trevor T. Tan (SBN 280145)

6 Reid Gaa (SBN 330141)

GIRARD SHARP LLP

601 California Street, Suite 1400

San Francisco, CA 94108

7 Telephone: (415) 981-4800

8 Facsimile: (415) 981-4846

9 apolk@girardsharp.com

sgrille@girardsharp.com

10 ttan@girardsharp.com

rgaa@girardsharp.com

11 *Counsel for Plaintiffs*

12  
13 Dated: April 29, 2024

By: /s/ Nathan Walker

14 Fred Norton (CA SBN 224725)

15 fnorton@nortonlaw.com

16 Nathan Walker (CA SBN 206128)

nwalker@nortonlaw.com

17 Bree Hann (CA SBN 215695)

bhann@nortonlaw.com

18 Gil Walton (CA SBN 324133)

gwalton@nortonlaw.com

19 Celine G. Purcell (CA SBN 305158)

20 cpurcell@nortonlaw.com

Emily Kirk (CA SBN 348547)

21 ekirk@nortonlaw.com

22 THE NORTON LAW FIRM PC

299 Third Street, Suite 200

23 Oakland, CA 94607

24 Telephone: (510) 906-4900

25 Attorneys for Defendant

26 *PATREON, INC.*

**ATTESTATION**

I, Simon Grille, am the ECF User whose ID and password are being used to file this document.  
In compliance with Civil L.R. 5-1(i)(3), I hereby attest that all counsel have concurred in this filing.

Dated: April 29, 2024

/s/ Simon Grille

Simon Grille

**[PROPOSED] ORDER**

**PURSUANT TO STIPULATION, THE COURT ORDERS AS FOLLOWS:**

All existing case deadlines are VACATED. The parties will execute a final settlement agreement and Plaintiffs will submit their motion for preliminary approval of the settlement by June 28, 2024.

Dated: \_\_\_\_\_

By: \_\_\_\_\_  
Honorable Joseph C. Spero  
United States District Magistrate Judge